

(Rev. 5/05)

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

(1) RAYMOND L. BRUTON, SBI# 069025
(Name of Plaintiff) (Inmate Number)

(Complete Address with zip code)

(2) _____
(Name of Plaintiff) (Inmate Number)

(Complete Address with zip code)

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

vs.

(1) Mrs. Pamela A. Minor
(2) Ms. Cheryl Regan
(3) Mr. Stanley W. Taylor
(Names of Defendants)

(Each named party must be listed, and all names
must be printed or typed. Use additional sheets if needed)

I. PREVIOUS LAWSUITS

- A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

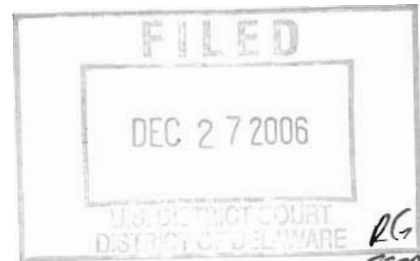
Civ. No. 00ev-01032. JJF, 2000, December

06 - 791 -

(Case Number)
(to be assigned by U.S. District Court)

CIVIL COMPLAINT

- • Jury Trial Requested



ADDITIONAL DEFENDANT"S

Warden Raphael Williams
H.R.Y.C.I., P.O. Box 9561
Wilmington, DE 19809

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ••Yes ••No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ••Yes ••No
- C. If your answer to "B" is Yes:
1. What steps did you take? Wrote to the Warden, Wrote to the Commissioner of Prison, Stanley Taylor. Wrote a Grievance, and wrote many letters to Mrs. Minor.
 2. What was the result? Everyone has advise Plaintiff to be patient.
- D. If your answer to "B" is No, explain why not: _____

III. DEFENDANTS (in order listed on the caption)

- (1) Name of first defendant: Mrs. Pamela A. Minor
- Employed as Administrator of Treat at H.R.Y.C.I.,
- Mailing address with zip code: P.O.Box 9561, Wilm. DE 19809
- (2) Name of second defendant: Ms. Cheryl Regan
- Employed as Counselor at HR.Y.C.I.,
- Mailing address with zip code: P.O. Box 9561, Wilmington, DE
19809
- (3) Name of third defendant: Mr. Stantley W. Taylor
- Employed as Commissioner of Prison at 245 Mckee Road
- Mailing address with zip code: Dover, DE 19904

(List any additional defendants, their employment, and addresses with zip codes, on extra sheets if necessary)

To: Ms. C. Pettyjohn, Classification
Treatment Department:

From: Raymond L. Bruton, SBI # 064035

Date: April 9, 2006:

RE: M.D.T. Classification:

Dear Ms. Pettyjohn;

May this letter arrive to find you in good
spirits.

Ms. Pettyjohn, Per Mr. Johnson's con-
versation with you on Friday, April 7, 2006,
I am requesting that my M.D.T. Hearing, the
results be deferred from being sent to the
Parole Board until I'm able to fulfill
the recommendations of the Parole Board
from their last meeting of February 8, 2005,
which are to develop a plan for continued
mental health, violent offender, and
anger management counseling.

cc: Parole Board:

Yours Truly,
Raymond L. Bruton

To: Mrs. Pamela A. Miner, Treatment Administrator

From: Raymond L. Bruton

Date: June 26, 2006

RE: Reply to Memorandum

Dear Mrs. Miner,

On April 25, 2006, I did request my classification for the upcoming Parole Board to be deferred, allowing me the opportunity to participate in AVP, to include Anger Management Counseling Group, and Violent Offender Group. Whereas, you had the opportunity from April 25, 2006, until June 24, 2006, to facilitate my completion of the AVP group, as you stated you would in April 2006.

Whereupon, in this memorandum, I received on Friday, June 23, 2006, your stating again, I quote, " that you will facilitate my enrolling in the AVP Program, however, it is unrealistic for you to accomplish this less than two months", un-quote. when this letter arrives to your office, it will be two months passed when I deferred my status.

Whereby, I'm not trying to find fault in you in anyway, and I am taking full responsibility for my actions; Therefore, at this date, June 26, 2006, I request to cancell my deferred status and move on to classification(MDT Board) without the AVP group.

However, I realize the charge (1) Delivery of Herion is not a violent offense(others concur with my evaluation in this judicial community) only I recieved and access amount of time.Further more, to wait another two months, to be placed in the AVP Program, I'm not in that state of mind, to do so, that would be a total of four months, just awaiting the AVP Program.

Therefore, I desire to be classified and moved to W-Pod, to be able to work and concentrate on my up-coming Parole Hearing, and the end of this repulsive sentence. Furthermore, living in the basement with no fresh air, no exercise, no gym, no sunshine, terrible fresh water, is very damaging to my health.

I'm praying to our sovereign God for justice and equality, to be administered from this administration which finds itself engrossed in its test of tedium of these everyday changing circumstances also included, for you to find the opportunity to do as this letter request of you.

cc: Bureau Chief, Paul Howard
Parole Board Chairperson, Dwight Holding
Warden Raphael Williams

Sincerely Yours,

Raymond L. Bruton

HOWARD R. YOUNG CORRECTIONAL INSTITUTION

CLASSIFICATION/TREATMENT UNIT

M E M O R A N D U M

TO: Inmate Raymond Bruton, SBI#069025, Housing Unit Dorm 2

FROM: Pamela A. Minor, Treatment Administrator

DATE: Thursday, June 22, 2006

RE: Response to Correspondence

Writer is in receipt of a letter from you **“requesting to move forward”, about AVP being clogged up (?), and regarding me not keeping my promise (?)**.

In your letter dated April 25, 2006, **you** asked that your classification for the Parole Board be deferred, allowing you to participate in AVP to include anger management counseling group and violent offender group. My e-mail to the Bureau Chief, Parole Board Chairperson, and Warden simply cited the anticipated completion of Key in June 2006, and **your** request to defer your parole hearing. While I will facilitate your enrolling in the AVP program, it is unrealistic to expect to accomplish this in less than two months. Perhaps instead of trying to find fault with me, you should take responsibility for your own actions. Likewise, I dispute your statement that I have you in a no win situation. As I recall, you got what you asked for.

PAM

Cc: Kim Nye
File



STATE OF DELAWARE
DEPARTMENT OF CORRECTION
HOWARD R. YOUNG CORRECTIONAL INSTITUTION
1301 EAST 12TH STREET
WILMINGTON, DELAWARE 19809
Telephone: (302) 429-7747
Fax: (302) 429-7716

Raphael Williams
Warden IV

MEMORANDUM

TO: Raymond Bruton, 00069025
2E Pod

FROM: Warden Raphael Williams

DATE: August 15, 2006

SUBJ: **YOUR RECENT CORRESPONDENCE**

Your correspondence has been forwarded to Pam Minor, Treatment Administrator, for review and response.

RW:adc

DISTRIBUTION

*Pam Minor, Treatment Administrator
File*

HOWARD R. YOUNG CORRECTIONAL INSTITUTION

CLASSIFICATION/TREATMENT UNIT

M E M O R A N D U M

TO: Inmate Raymond Bruton, SBI# 069025, Housing Unit 2Q 21

FROM: Pamela A. Minor, Treatment Administrator

DATE: Wednesday, September 13, 2006

RE: Response to Correspondence

This morning, while in the East side Law Library, you approached writer, asking that I place your name on the list for the Alternative To Violence Program (AVP). I have informed the appropriate staff person to ensure that your name is added to the list. It was explained that the "Basic" course is not offered every month; however, when the next "Basic" class is scheduled, you will be included. Writer is making such a request to comply with the order of the Board of Parole, noting that you could not attend the class when previously scheduled.

PAM

Cc: File

Howard R. Young Correctional Institution

Memorandum

To: RAYMOND BRUTON, 20-21

From: Ms. Jean Booker, JLB
Volunteer Services Administrator

Date: September 15 2006

Subject: Alternatives To Violence Project (AVP) Basic Workshop
September 29, 30, October 1, 2006

Received 9/20/06

=====

You have been selected from the AVP waiting list to attend the upcoming Basic AVP seminar to be held in the Education area on Friday evening, 9/29/06, from 18:00 to 21:00 hours, and on Saturday, 9/30/06, and Sunday, 10/01/06, from 07:30 to 15:45 hours Attendance is voluntary. However, should you wish to attend you must participate all three days to receive your certificate, and you will not be permitted to receive visits that weekend.

To be placed on the memo for the seminar please respond using the attached form no later than Wednesday, 9/20/ 2006. The seminar will be filled on a first come basis. If you are unable to attend but wish to remain on the waiting list you must also return the form below. Your name will be retained on the waiting list for future seminar dates. Your cooperation is appreciated.

TO: MRS. Pamela A. Minor, Treatment Administrator

FROM: Raymond L. Bruton

DATE: October 1, 2006

RE: Parole Date

Dear Mrs. Minor;

On October 1, 2006, I was successful at completing the (AVID) Basic week shop. I rec'd the certificate and I am scheduled for the advanced class, which will be scheduled somewhere in the month of November 2006.

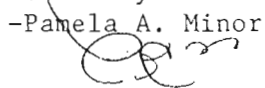
Whereas, with this accomplishment, is it fair for me to assume, I will be classified and promptly place for a review before the Parole Board?

Furthermore, I appreciate your assistance, and I realize this matter could not have been finalized without your direction, Thank you.

Tuesday, October 3, 2006

By copy of this letter, I will request that a counselor follow-up, and review your status with you.

-Pamela A. Minor



Yours Truly,
Raymond L. Bruton

TO: MRS. Pamela A. Minor,
Classification Treatment Unit

FROM: Raymond L. Burton

DATE: October 17, 2006

RE: Classification & Parole Date

DEAR MRS. MINOR;

No counselor has seen me, as of the date
of this note. Is there something wrong?

Thursday, October 19, 2006

To my knowledge, consideration
for a Pre-Parole staffing has
not been initiated, since you opted
to have your Parole deferred.

I am aware that you did the AVP
Beginners workshop; therefore, your
case will be reviewed to see where
we go from here.

-Pamela A. Minor

MRS. Kelly,
Raymond L. Burton

To: Mrs. Reagan

From: Raymond L. Burton

Date: October 22, 2006

RE: my Parole Date & Classification

Dear Mrs. Reagan;

Enclosed is a letter written to Mrs. Miller on October 5, 2006, with her reply written at the bottom of the page.

Mrs. Reagan, I am trying to move forward in my haste to proceed to the Parole Board. However, I first must have and MDIT hearing.

Would you please place me on your list to see ON 2 Q-Pad.

Yours Truly,
Raymond L. Burton

TO: MRS. Pamela A. Minor; Administrator of Treatment

FROM: Raymond L. Beuten

DATE: October 29, 2006

RE: Parole Date

Tuesday, October 31, 2006

I believe that you addressed this matter in a previous letter, and my response was that the appropriate staff would meet to assess your status, and act in accordance to procedure. I suggest that you be cooperative and patient throughout this process.

Pamela A. Minor, Treatment Administrator

Dear Mrs. Minor;

I wrote to you on two occasions, this month of October, 2006. I informed you I completed the AUP Group, and as you mention in your reply note, I did defer my MDT Hearing until I completed the AUP Group, that was completed on Oct. 1, 2006, the day I wrote you my first letter.

Whereas, nothing should be delaying my MDT Hearing at this date and time.

Please, Mrs. Minor, place my name before the MDT Board, for a hearing as soon as possible.

cc: Warden Williams

Sincerely,
Raymond L. Beuten



STATE OF DELAWARE
DEPARTMENT OF CORRECTION
HOWARD R. YOUNG CORRECTIONAL INSTITUTION
1301 EAST 12TH STREET
WILMINGTON, DELAWARE 19809
Telephone: (302) 429-7747
Fax: (302) 429-7716

Raphael Williams
Warden IV

MEMORANDUM

*TO: Raymond Bruton, 00069025
Q Pod*

FROM: Warden Raphael Williams

DATE: October 30, 2006

SUBJ: YOUR RECENT CORRESPONDENCE

Your correspondence has been forwarded to your unit counselor, Ms. Cheryl Regan, for review and any action deemed appropriate. I do not become involved in individual cases.

RW:adc

DISTRIBUTION

*Ms. Cheryl Regan, Unit Counselor
File*

Raymond L. Beuten
SBI #069025 unit 20-Pd
H.R.Y.C.I., P.O. Box 9561
Wilmington, DE 19809

November 20, 2006

MR. Stanley W. Taylor JR.
Commissioner of Prison
Bureau of Prisons
245 McKee Road
Dover, Delaware 19904

RE: Parole Hearing

Dear Mr. Taylor;

ON April 26, 2006, I requested my classification for the up-coming Parole Board to be deferred, allowing me the opportunity to participate in a AUP, Anger Management Counseling Group.

The reason being, Ms. C. Pettyjohn would not vote in my favor to make parole at the MDT Hearing because I had not completed the Requested Anger Management Group, which was requested by the Board of Parole. In turn, the entire MDT Board decided not to vote in my favor.

Mr. Taylor, I did the only thing left open to me, complete an Anger Management Group. I deferred my MDT Classification until I had completed the wishes of the Parole Board and the MDT Board.

Page 2

on or about May or June 2006, Ms. Pettyjohn transferred to the Delaware Correctional Center, working on the Classification Board.

I have since directed my contact to Mrs. Pamela A. Mince, Treatment Administrator.

Whereas, I have completed the GUP Group, as of October 1, 2006, I have written (4) Letters to Mrs. Pamela A. Mince, and (2) Letters to Ms. Cheryl Regan unit counselor.

Ms. Regan would not reply to my letters. And Mrs. Mince has told me, I quote in her last response on Tuesday, October 31, 2006, I believe that you addressed this matter in a previous letter, and my response was that the appropriate staff would meet to assess your status, and act in accordance to procedure. I suggest that you be cooperative and patient throughout this process.

Pamela A. Mince, Treatment Administrator:

Mr. Taylor my due process is being violated and I'm tired of being told anything and nothing being done. I am very aware of my rights, what is being done to me is wrong, Mr. Taylor.

I hope to hear from you on this issue.

Yours Truly,
Raymond L. Bruton

FORM #584

GRIEVANCE FORM

FACILITY: A.E.U.C.I DATE: 11/21/06
 GRIEVANT'S NAME: Raymond L. Butler SBI#: 069025
 CASE#: _____ TIME OF INCIDENT: 11:00 clock AM
 HOUSING UNIT: 2 Q-Pad

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

Tim Deuten has defered the MDT Board's Classification until Tim had completed the AUP Program, around or about April 26, 2006. As of the month of October 1, 2006, Tim has completed the AUP Program and has asked Counsel Cheryl Regan and her Superior Mrs. Pamela A. Mink, Treatment Administrator to lift the deferred status and proceed on to Tim's parole date and hearing. Counsel Cheryl Regan will not answer his letters and Mrs. Mink keeps in forming Tim that some special operation must be completed which Tim has not the slightest clue of what she is referring to.

ACTION REQUESTED BY GRIEVANT: Investigate and find out why Mrs. Pamela A. Mink and MS Cheryl Regan will not allow Tim Butler to proceed on to his MDT Classification and to ^{start} a parole date and attend his soon to be scheduled Parole Hearing. Tim's due process is being denied to him the months are flying by.

GRIEVANT'S SIGNATURE: Raymond L. Butler DATE: 11/22/06

WAS AN INFORMAL RESOLUTION ACCEPTED? _____ (YES) _____ (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____ DATE: _____

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

cc: INSTITUTION FILE
 GRIEVANT

TO: Warden Raphael Williams IV

FROM: Raymond L. Beston

DATE: November 23, 2006

RE: Moving Forward To my Parole Hearing

Dear Warden Williams;

I am giving thanks to being alive and well on Thanks Giving Day, and I pray this day was whole-some and a blast day from God, for you and your Family.

Warden Williams, I have a problem with Mrs. Pamela A. Miner, denying me my MDT classification and delaying my Parole Date and Hearing for as long as she possibly can.

I wrote to my Counselor, Ms. Cheryl Regan (2) letters, no reply; I wrote to Mrs. Miner, she replied by a note on (3) occasions, Nothing has been accomplished.

In the month of June 2006, I asked Mrs. Miner to allow me to proceed to the Parole Board without the completion of the AUP Group, she refused me my Request, about my Parole Hearing!!

Now, I have completed the Requested AUP Program and Mrs. Miner still refuses to allow me to move Forward to my MDT Hearing which I will from that process, move to my Parole Hearing.

Page 2

Warden Williams, on October 30, 2006, I received a Reply to my Letter From you, and you stated in your correspondence, you Forwarded my Letter to my Counselor, Ms. Cheryl Regan, For Review and any action deemed appropriate. And, how you do NOT become involved in individual cases.

Warden Williams, you are the head man in charge of this Institution, when you say jump, your complete staff, can "only" say how high. I have brought to your attention a problem I am having with your staff. Its quite obvious, on their own initiative they are doing what they deem necessary, denying me my Constitutional Rights to my Fair Hearing.

Warden Williams, the only outlet I have Left is the Courts, however, I wanted to give you the opportunity First, with this Letter, to get involved with your staff, to find out exactly what the problem is.

Have a wonderful Holiday Season.

Yours Truly,
Raymond L. Butler

STATE OF DELAWARE
DEPARTMENT OF CORRECTION
HOWARD R. YOUNG CORRECTIONAL INSTITUTION
OFFICE OF THE GRIEVANCE CHAIRPERSON
1301 E. 12TH STREET
WILMINGTON, DE 19801

MEMORANDUM

TO: Inmate Raymond Bruton 2 Q 21

FROM: Sgt. Moody, Inmate Grievance Chairperson

DATE: 11/28/06

RE: YOUR RECENT GRIEVANCE #06- 82944

This memo is to inform you that the grievance submitted by you dated 11/22/06, regarding Classification is not grievable for the following reason(s):

- ☐ The complaint was addressed by the IGC: _____
- ☐ Security issue (involves the security and/or staffing of the Institution and/or the safety, health, and/or welfare of inmates, staff and the public).
- ☒ Classification issues (security classification, jobs, transfers, programs, housing unit assignment). Classification has its own appeal process. The inmate must write to the Treatment/Classification Unit within seven (7) days after the inmate receives the Classification decision. The letter must state that the inmate is appealing the classification and clearly indicate the reasons the inmate disagrees with the classification decision.
- ☐ Disciplinary issue. Disciplinary actions cannot be grieved but must be APPEALED within 24 hours of the Class I or Class II Hearing Decision. Complete an appeal form and mail it to the facility Hearing Officer within 24 hours of receiving the form. Please note that 24 loss of all privileges cannot be appealed.
- ☐ Parole Board Decision. The inmate must write a letter to the Parole Board within 30 days of the Board's decision. Expressing the desire to appeal the decision and listing the reasons. The Parole Board's address is: Board of Parole, Carvel State Office Building, 820 N. French Street, 5th Floor, Wilmington, DE 19801.
- ☐ Inmates cannot request or demand disciplinary action on staff. If you have a complaint regarding staff write a letter to that person's supervisor. In this case, that is:
- ☐ This is an issue/complaint that has already been grieved by you or another inmate. _____
- ☐ Grievance is unacceptable because it has passed the seven (7) day time frame allotted to file a grievance.
- ☐ The grievance is a photocopy, carbon copy, written in pencil or red ink. Original grievance forms must be written in black or dark blue ink.
- ☐ This complaint is addressed in the Inmate Handbook. Refer to the handbook page _____ for clarification and/or direction.



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HOWARD R. YOUNG CORRECTIONAL INSTITUTION
1301 EAST 12TH STREET
WILMINGTON, DELAWARE 19809
Telephone: (302) 429-7747
Fax: (302) 429-7716

Raphael Williams
Warden IV

MEMORANDUM

TO: Raymond Bruton, 00069025
Q Pod

FROM: Warden Raphael Williams *[Signature]*

DATE: November 27, 2006

SUBJ: **YOUR RECENT CORRESPONDENCE**

It is my understanding that your parole paperwork was started while in the Key Program, but it was deferred pending completion of Key and Anger Management. Both Ms. Regan and Ms. Minor are aware of your request to move forward with the parole application. It is further noted that both these individuals have responded to you in writing and Ms. Regan has been approached by you on several occasions while on the housing unit. I suggest you be patient.

RW:adc

DISTRIBUTION

File

To: Warden Raphael Williams IV

From: Raymond H. Burton

Date: December 3, 2006

Re: Reply To Correspondence

Dear Warden Williams;

I Received your Reply to my Correspondence
For your assistance on 11/12/06.

Warden Williams contrary to the understanding
Ms. Regan and Mrs. Minee are seemingly exhibiting
and demonstrating.

ON ONE OCCASION I spoke to Ms. Regan, asking
her while I was in the medication line, was she
going to 2Q-Pod to interview Raymond Burton,
She said "NO" that has been the extent of any in-
volvement with me to Ms. Regan.

Mrs. Minee acts as if I must seek her per-
mission to obtain a Parole Hearing before the Board
of Parole. Again I state, Mrs. Minee is violating
my Constitutional Rights To my Parole Hearing.
This is totally my choice to go before the Board of
Parole. The U.S. Senate in Washington DC has
given this Constitutional Process to all person
whom have a Parole Hearing.

MRS. MINER has no authority to tell me yes or no when I'm to have a hearing. ALL that is require of her and her staff, prepare a false report from the MDT Hearing and nothing more.

However, she has told me when I requested of her to ignore the ACP Program, that I wanted to proceed on to the Board of Pardon, she denied me my own decision. MRS. MINER has taken full control of this process which she has no constitutional right to do so. *Wilkinson v. Dotson*, cite as 125 S.Ct 1242 (2005) speaks on my Pardon-eligibility proceedings and Pardon suitability proceedings. Whatever MRS. MINER and MS. REGAN are doing makes no sense to me, and I am the one who should be told of what where and how about this process.

Someone needs to step forward and inform MRS. MINER and MS. REGAN.

Yours Truly,
Raymond L. Bruton



STATE OF DELAWARE
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Fax: (302) 429-7716

Raphael Williams
Warden IV

MEMORANDUM

TO: *Raymond Bruton, 00069025*
Q Pod

FROM: *Warden Raphael Williams*

DATE: *December 4, 2006*

SUBJ: ***YOUR RECENT CORRESPONDENCE***

I can only alert Ms. Minor to your request and ask her to review your case and take the appropriate action.

RW:adc

DISTRIBUTION

Pam Minor, Treatment Administrator
File

STATEMENT OF FACTS

On April 9, 2006, Plaintiff requested of Ms. C. Pettyjohn, Classification Treatment Department to defer the MDT Hearings result, which would normally be sent to the Board of Parole, until Plaintiff was able to comply with the Board of Parole's recommendation completing an Anger Management Group counseling Program.

Ms. Pettyjohn was transferred to the Delaware Correctional Center, Plaintiff had to correspond to Ms. Pettyjohn's superior, Mrs. Pamela A. Minor and directed Plaintiff's request to her.

Mrs. Minor the Administrator of Treatment has refused to allow Plaintiff to move forward to his unscheduled Board of Parole Hearing. Ms. Cheryl Regan counselor for 2Q-Pod and Mrs. Minor are deliberately with-holding the MDT Classification from Plaintiff. Plaintiff because he requested the deferment has completed the require commitment by completing the AVP Group on October 1, 2006.

Plaintiff started this process in April 2006, an the New Year is approaching and Plaintiff because of some problem with Mrs. Minor, Treatment Administrator and Ms. Cheryl Regan, they are violating Plaintiff's constitutional rights by refusing to allow Plaintiff to move forward to his constitutional right of having his Due Prosess, his Parole Hearing.

On three occasions in the Month of October 2006, Plaintiff has tried unsuccessfully to request of Mrs. Minor to allow Plaintiff to go before the Parole Board for his review. In April 2006, Plaintiff deferred his MDT Classification for the Parole Board until Plaintiff had the opportunity to complete the AVP Program because the Parole Board requested completion of an anger management group. At this point Mrs. Minor will not allow forward movement with his classification, for some unknown reason which is not in her job authority to make a decision denying Plaintiff to preceed to his Board of Parole Hearing.

Plaintiff states warden Raphael Williams, plaintiff wrote letters requesting his assistance to prevent Mrs. Minor and Cheryl Regan from the wanton violation of plaintiff's constitutional rights to have his Board of Parole Hearing, and the Warden should be equally held responsible for their denial of Plaintiff's right Warden was advised of his staff's refusal to act or to give a reason why they haven't.

Plaintiff further states Mr. Stanley W. Taylor the Commissioner of Prison, also should be held liable for the acts of his staff because he was advised of the staff's failure to allow Plaintiff to preceed to his Parole Hearing, however, he did absolutely nothing at all.

Raymond L. Bruton

Raymond L. Bruton
SBI# 069025 Unit 2Q-Pod
H.R.Y.C.I., P.O.Box 9561
Wilmington, DE 19809

Dated: December 20, 2006

IV. STATEMENT OF CLAIM

(State as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets of paper if necessary.)

1. SEE ATTACHED STATEMENT OF CLAIM

2. SEE ATTACHED STATEMENT OF CLAIM

3. SEE ATTACHED STATEMENT OF CLAIM

V. RELIEF

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. Plaintiff respectfully with prayer, request
of the Court to be compensated and request punitive damages
against the defendant's for deliberately refusing
Plaintiff his constitutional rights to obtain his
Board of Parole Hearing:

2. Defendant's are violating Plaintiff's 5th and 14th
Amendment Rights to the U.S. Constitution and will not
let Plaintiff move forward even as Plaintiff has written
and complained to everyone in authority.

3. Plaintiff's health and welfare is being affected by the
denial of Mrs. Minor an Cheryl Regan of Plaintiff's
constitutional right to have his Parole Hearing, by
not letting him complete the process required by the
Board of Parole to proceed to the Board of Parole for
Plaintiff's formal Hearing:

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 20 day of December, 2006

Raymond L. Britton
(Signature of Plaintiff 1)

(Signature of Plaintiff 2)

(Signature of Plaintiff 3)

Mr. Raymond L. Burton
SBI # 069025 UNIT 2 Q-7d
R.Y.C.I., P.O. Box 9561
Wilmington, DE 19809



Office of the Clerk
United States District Court
844 N. King Street, Lockbox 18
Wilmington, Delaware 19801-3570

